

# EXHIBIT C

February 26<sup>th</sup>, 2019

From: Chaz Pinkston  
M.D.O.C. #148934  
Wilkinson County Warehouse  
Unit: H-J-K H-pod Cell #10  
P.O. Box 1889  
2999 U.S. HWY 61 North  
Woodville, MS 39669

To: Candice L. Rucker and Molly Walker  
Attorney At Law Attorney At Law

Re: Chaz Pinkston v. Dr. Hendrick Kuiper  
Civil Action No. 4:17-cv-039-DMB-DAS

Accompanying this cover-letter is a copy of the questions that I am submitting to Nurse Leatha Barron of which her answers must be SWORN to. Please Note: That these questions do not negate nor supersede whatever relief that the Court so orders and/or grants from the Motion Of Miscellaneous Relief that the Plaintiff filed on February 1<sup>st</sup>, 2019.

Respectfully,  
Chaz Pinkston

## Questions For Nurse Leatha Barron

1. Are you familiar with the protections and procedural guidelines in effect according to *Washington v. Harper*?
2. What was the plaintiff mental diagnosis by your psychiatrist Dr. Gail Williams and psychologist Dr. May Leflore on September 14<sup>th</sup>, 2016?
3. What was the Plaintiff's mental diagnosis by your psychiatrist Dr. Gail Williams and Dr. May Leflore from July 21<sup>st</sup>, 2016 through to September 30<sup>th</sup>, 2016?
4. Is it the normal custom and practice to forcibly medicate prisoners who don't have mental disorders?
5. Did the camera's record the prisoner's in the cell's?
6. Were there camera's in the Plaintiff's cell?
7. If yes, how many were there?
8. Isn't it against policy to forcibly medicate a discharged prisoner?
9. How many involuntary medication hearing's had you witnessed occur in Hospital Unit #42 before you injected anti-psychotic's/neuroleptic's into prisoners from July 2016 to September 2016?
10. Did you make rounds ever without an officer escorting you?
11. Did the Plaintiff ever physically harm or attempt to harm any medical personnel from July 18<sup>th</sup>, 2016 til September 2016?
12. Is Benadryl a psychiatric medication?
13. What are the side-effects of Benadryl mixed with Haldol?
14. What are Benadryl side-effects to a person suffering from severe eczema and severe psoriasis?

15. What are Haldol side-effects alone?
16. Doesn't Haldol have eczema as one of it's side-effects?
17. Doesn't Benadryl have serious adverse-effects on a person with severe eczema and severe psoriasis?
18. Was it a normal custom and occurrence to administer anti-psychot /neuroleptic shots to prisoner's who were not obedient to staff order?
19. Why didn't and wouldn't you go talk to the Plaintiff from 8:00 a.m. v to 11:30 a.m. when you are the Head Charge nurse over that ~~floor~~ plus you have a degree in rehab?
20. Why wouldn't a tranquilizer not be used instead of Haldol and Benadryl?
21. Aren't you familiar with the M.D.O.C. disciplinary system which uses R.V.R's (Rule Violation Reports)?
22. Why didn't you write the Plaintiff any R.V.R.?
23. About how many other nurses were on the second floor at the nurses station that you were in charge of on September 14<sup>th</sup>, 2016?
24. What month did you leave working at the Mississippi State Penitentiary?
25. Why did you leave after being there for over two years?
26. How many other prisoners did you forcibly administer medication to before and after September 14<sup>th</sup>, 2016 though just within the year of 2016?
27. If you were afraid of the Plaintiff why wouldn't you and/or the doctor have one of the other nurses on the floor with you or in the hospital administer the shots he ordered?
28. How do you regard Chaz Pinkston as a person?
29. If you could describe Chaz Pinkston in thirty-(30) words what would you say?



30. How many prisoners have you forcibly medicated during the time of your employment at the Mississippi State Penitentiary that have 'personality flaws' but not mental disorders?
31. From your 'sworn' testimony/deposition on January 30<sup>th</sup>, 2019 it is safe to say affirmatively that, 'You didn't wanna to talk to, Chaz Pinkston, from the time you made your rounds at 8:00 a.m. but you willingly talked to Dr. Kuiper about forcibly medicating, Chaz Pinkston, just to quiet him?'
32. In your 'sworn' statement you mentioned but abruptly stopped explaining about: "Question: Okay. And you said Dr. Kuiper ordered a shot of Haldol. And he also order a shot of Benadryl?"  
Your Answer: Yes. We use it in a way that the psychiatric ---." Will you please explain and elaborate on your statement because your answer was cut short and is unclarified?
33. Since, Chaz Pinkston, quieted down once all the officer's came to the cell door to handcuff him than it is obvious that he wasn't a threat to you nor any security staff, right?
34. Since, Chaz Pinkston, quieted down as well as didn't assault nor attempt assault you or any security personnel, despite his repetitive verbal stating that he didn't need nor want any shots; than it is true that the forcible injection's weren't for an emergency situation nor to correct/treat a person with a mental disorder?
35. Are you knowledgeable about M.D.O.C. Policy 25-04-I# Forcible Administration To A Non-compliant Inmates?
36. Are you experienced with M.D.O.C. Policy 25-01-J Forcible Administration of Medication?
37. Are you experienced with M.D.O.C. Policy 25-15-D Psychotropic Medications?
38. Why didn't you and Dr. Kuiper administer anti-psychotic's/neuroleptics to all the other prisoner's whom you said/swore were being disruptive.

at that time?

39. What is the custom and practice for you once, Chaz Pinkston, coherently refused the anti-psychotic shots?

40. Why did Dr. Kuiper go to see why was, Chaz Pinkston, making noise but you being the Head Charge Nurse refused to help, Chaz Pinkston for hours upon hours?

41. What did Chaz Pinkston and Dr. Kuiper talk about when Dr. Kuiper first came on the ward?

42. What is the definition of malingering?

43. Have you ever been a defendant in any "lawsuits" throughout your career other than this one?

44. Did Chaz Pinkston destroy or damage any state property on September 14<sup>th</sup>, 2016?

45. Did Chaz Pinkston flood out the cell on September 14<sup>th</sup> or before or after?

46. Why didn't you give Chaz Pinkston medical care and treat the boils on his upper thigh?

47. Why didn't you care for or care to treat Chaz Pinkston severe eczema and severe psoriasis?